

[REDACTED]

[REDACTED]

[REDACTED]

## **VI. FINANCIAL INVESTIGATION**

18. Between in or around January 2020, through in or around April 2022, CONSTANTIN profited in excess of \$79 million in identified fraudulent funds (“fraud proceeds”) based on the illegal investment scheme. Since CONSTANTIN maintained individual investments accounts the fraud proceeds were accumulated in his respective investment accounts and subsequently transferred to other financial accounts which CONSTANTIN used to purchase real properties and luxury vehicles.

19. CONSTANTIN conducted a large volume of his illegal securities trading activity in TD-Ameritrade account [REDACTED] (CONSTANTIN INVESTMENT) and TARGET ACCOUNT 2. CONSTANTIN subsequently sent a large amount of the illicit funds to his TARGET ACCOUNT 1 and subsequently to TARGET ACCOUNT 6.

20. Based upon my training and experience, I know that conducting financial transactions with fraud proceeds in order to promote the underlying fraud scheme is a violation of Title 18, United States Code, Section 1956(a)(1)(A)(i). Furthermore, I know that any financial transactions that involved greater than \$10,000 in fraud proceeds also constitute violations of the money laundering “spending statute,” codified at Title 18, United States Code, Section 1957.

21. As indicated above, an analysis of the securities trading records for CONSTANTIN revealed that CONSTANTIN profited more than \$79 million in identified fraud funds based on his illegal investment scheme. The following chart details by month (event end date) from January 2020 through August 2022 the amounts of the identified fraud proceeds attributed to

CONSTANTIN:

YEAR	2020	2021	2022
JANUARY	\$8,550.00	\$15,634,390.00	\$0.00
FEBRUARY	\$13,400.00	\$22,564,770.00	\$0.00
MARCH	\$100.00	\$13,212,890.00	\$236,110.00
APRIL	\$140.00	\$59,720.00	\$482,790.00
MAY	\$0.00	\$1,725,620.00	\$11,920.00
JUNE	\$248,600.00	\$2,472,090.00	\$0.00
JULY	\$121,510.00	\$814,420.00	\$0.00
AUGUST	\$820,640.00	\$110.00	\$30,570.00
SEPTEMBER	\$116,300.00	\$47,140.00	
OCTOBER	\$383,890.00	\$7,069,170.00	
NOVEMBER	\$156,600.00	\$9,753,230.00	
DECEMBER	\$1,698,370.00	\$2,224,820.00	
TOTALS	\$3,568,100.00	\$75,578,370.00	\$761,390.00

\*rounded to the nearest \$10.00

22. Between April 2020 through October 2021, CONSTANTIN used a portion of the fraud funds that he profited from to purchase numerous assets valued at more than \$6 million including, real properties and vehicles, in addition to paying off an existing mortgage on his current residence. The following list details some of the asset purchases totaling approximately \$6,106,956.75 by CONSTANTIN during the above referenced time period:

